

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

AGSPRING, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-10699 (CTG)

Jointly Administered

**Re: Docket No. 54**

**CERTIFICATION OF COUNSEL REGARDING DEBTORS' MOTION FOR ENTRY  
OF AN ORDER (A) AUTHORIZING THE MAINTENANCE AND CLOSURE  
OF CERTAIN BANK ACCOUNTS AND CONTINUED USE OF EXISTING  
CHECKS, (B) AUTHORIZING THE CONTINUED USE OF EXISTING CASH  
MANAGEMENT SYSTEM, AND (C) GRANTING LIMITED RELIEF FROM  
THE REQUIREMENTS OF BANKRUPTCY CODE SECTION 345(B)**

The undersigned hereby certifies that:

1. On July 28, 2023, the above-captioned debtors and debtors in possession (the "Debtors") filed the *Debtors' Motion for Entry of an Order (A) Authorizing the Maintenance and Closure of Certain Bank Accounts and Continued Use of Existing Checks, (B) Authorizing the Continued Use of Existing Cash Management System, and (C) Granting Limited Relief from the Requirements of Bankruptcy Code Section 345(b)* [Docket No. 54] (the "Motion") with the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court").

2. Pursuant to the notice of the Motion, responses were due to be filed on, or prior to, August 11, 2023 at 4:00 p.m. (ET) (the "Objection Deadline"). The Objection Deadline was extended to August 16, 2023 for the Office of the United States Trustee (the "UST"). The Debtors received informal comments to the Motion from the UST.

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Agspring, LLC (7735); Agspring Idaho 1 LLC (1720); Agspring Idaho LLC (8754); FO-ND LLC, dba Firebrand Artisan Mills (1520); Agspring Logistics LLC, dba Agforce (6067); and Agspring Idaho 2 LLC (9262). The Debtors' mailing address is 5101 College Boulevard, Leawood, KS 66211.

3. The undersigned certifies that the Bankruptcy Court's docket has been reviewed in this case and no answer, objection or other responsive pleading to the Motion appears thereon.

4. A revised form of order (the "Proposed Order") resolving the UST's comments is attached hereto as Exhibit A. A blackline comparison of the Proposed Order against the form of order filed with the Motion is attached hereto as Exhibit B. The UST does not object to entry of the order.

5. Accordingly, the Debtors respectfully request entry of the Proposed Order at the Bankruptcy Court's convenience.

Dated: August 16, 2023

**PACHULSKI STANG ZIEHL & JONES LLP**

/s/ Laura Davis Jones

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-and -

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*Proposed Counsel for Debtors and Debtors in Possession*